

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LIBERTY MUTUAL FIRE INSURANCE
COMPANY,

Plaintiff,

-against-

HAMILTON INSURANCE COMPANY,
formerly known as VALIANT INSURANCE
COMPANY,

Defendant.
-----X

Civil Action No.
17 CV 2350 (KPF)(AJP)

**LIBERTY MUTUAL
FIRE INSURANCE
COMPANY'S
INITIAL DISCLOSURES**

C O U N S E L O R S :

Plaintiff LIBERTY MUTUAL FIRE INSURANCE COMPANY ("Liberty Mutual"), by its attorneys, JAFFE & ASHER, LLP, hereby make the following initial disclosures to the defendant HAMILTON INSURANCE COMPANY, formerly known as VALIANT INSURANCE COMPANY ("Hamilton"), pursuant to Rule 26(a)(1)(A), as follows:

(i) The individuals known to Liberty Mutual who are likely to have discoverable information that Liberty Mutual may use to support its claims or defenses:

1. Paul Kayata, Sr. Technical Claims Specialist,
Liberty Mutual Fire Insurance Company
P.O. ox 7214
London, KY 40742-7214

Mr. Kayata will have information concerning communications with Hamilton and Riverstone Claims Management ("Riverstone"), regarding the tender of Gilbane's defense and indemnification to Hamilton for the underlying action entitled, Angel

Siguencia v. Gilbane Building Company, Gilbane Inc., Gilbane Resources, Inc., Dormitory Authority of the State of New York, All Safe LLC, The City of New York and City University Construction Fund, Index No. 305543/2011, in the Supreme Court of New York, Bronx County (the “Underlying Action”). Mr. Kayata will also have information concerning the amount of defense costs incurred in the defense of Gilbane in the Underlying Action.

2. Bruce A. Seidman, Esq.,
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, NJ 07068

Mr. Seidman, Esq., will have information concerning communications with Hamilton and Riverstone regarding tender of Gilbane’s defense and indemnification to Hamilton and defense invoices, including expenses, in defending Gilbane in Underlying Action. Mr. Seidman will also have information concerning the amount and substance of defense costs incurred.

3. Hillary A. Fraenkel, Esq.,
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, NJ 07068

Ms. Fraenkel, Esq., will have information concerning communications with Hamilton and Riverstone regarding tender of Gilbane’s defense and indemnification to Hamilton and defense invoices, including expenses, in defending Gilbane in Underlying Action. Ms. Fraenkel will also have information concerning the amount and substance of defense costs incurred.

4. Michael Buckley, Esq.,
Buckley Law Group, P.A.
225 Broadway, Suite 2600
New York, New York 10007

Mr. Buckley, Esq., will have information concerning communications with Liberty Mutual, Hamilton's acceptance of tender and Hamilton's acknowledgement of the reimbursable amount in defense costs incurred by Liberty Mutual in the defense of Gilbane in the Underlying Action.

5. Kevin Follett, Sr. Case Manager,
RiverStone Claims Management
250 Commercial Street
Manchester, NH 03101

Mr. Follet will have information concerning communications regarding the tender of Gilbane's defense to Hamilton and Hamilton's acceptance.

- (ii) The following documents are in the possession, custody or control of Liberty Mutual and may be used to support Liberty Mutual's claims or defenses:
 - a. The Complaint in the settled Underlying Action;
 - b. The October 23, 2008 written contract whereby Dormitory Authority of the State of New York ("DASNY"), as owner, and Preferred Builders, as Foundation Contractor, agreed to perform certain work at a construction project at the premises known as Lehman College, 29-90 Goulden Avenue, Bronx, New York, the New Building Lehman College Science Facility (the "Project") ("Trade Contract");

- c. The September 22, 2008 Contract between DASNY as Owner and Gilbane Building Company, as Construction Manager of the Project;
- d. Vallant Insurance Company Commercial General Liability policy, No. CGL-VIC-0004871-1, with a policy period of June 6, 2010 to June 6, 2011 to Preferred Builders as the named Insured;
- e. Pleadings and other documents served and filed in the Underlying Action;
- f. Communications between Liberty Mutual and Hamilton regarding the tender of Gilbane's defense and indemnity;
- g. The December 28, 2010 letter by counsel for Gilbane to Preferred Builders and Preferred Builders' insurers on behalf of Gilbane;
- h. The January 3, 2011 letter by counsel for Gilbane to Vallant tendering the defense and indemnification of Gilbane in the Underlying Action to Vallant;
- i. The October 21, 2011 letter from Riverstone rejecting the tender of the defense and indemnification of Gilbane for the claims brought in the Underlying Action;
- j. The October 11, 2013 letter from Riverstone, as claims handler for and on behalf of Vallant, to Gilbane's counsel accepting Gilbane's tender;
- k. Communications between Marshall Dennehey and Hamilton regarding the tender of Gilbane's defense and indemnity; and
- l. Defense invoices from Marshall Dennehey and other vendors and documents showing the costs incurred in defending the Underlying Action.

(iii) Liberty Mutual seeks the recovery of damages consisting of the reimbursement of defense costs paid by Liberty Mutual plus interest at 9% per annum. Copies of documents showing the direct paid disbursements totaling \$36,662.45 are annexed hereto as Exhibit "A". We are in the process of gathering the attorneys' fee invoices and will supplement our disclosure when received.

(iv) Not applicable.

Liberty Mutual reserves the right to supplement and amend these disclosures consistent with Fed. R. Civ. P. 26(e).

Dated: New York, New York
August 31, 2017

Yours, etc.,

JAFFE & ASHER LLP

By: 

Marshall T. Potashner, Esq.
Attorneys for Plaintiff
LIBERTY MUTUAL FIRE INSURANCE
COMPANY
445 Hamilton Avenue, Suite 405
White Plains, New York 10601
(212) 687-3000

To: BUCKLEY LAW GROUP, P.A.
Attorneys for Defendant
HAMILTON INSURANCE COMPANY
formerly known as
VALIANT INSURANCE COMPANY
225 Broadway, Suite 2600
New York, New York 1007
(212) 514-7400

Exhibit A



NSI
1208 Davenport Ave
Canton, MA 02021
(800)721-7055
<http://www.nationalsi.com>

National Surveillance & Investigation Inc.

Invoice

| Date | Invoice No. |
|------------|-------------|
| 02/02/2014 | NY1287A-VC |
| Due Date | |
| 03/01/2014 | |

Bill To

Paul Kataya
Liberty Mutual Insurance Co.
13 Riverside Dr.
Weston, MA 02493

| Activity | Quantity | Rate | Amount |
|--|----------|-------|----------|
| <ul style="list-style-type: none"> DVD Video Copy - 5 copies requested. sent 5 DVD copies to Bruce A Seidman Esq, 425 Eagle Rock Ave, Suite 302, Roseland, NJ 07068 PH: 973-618-4173 - sending invoice both with DVD's and emailing a Copy to Paul Kayata. | 5 | 50.00 | 250.00 |
| Total | | | \$250.00 |

Check out our Guaranteed Surveillance Program!

EIN: 20-2773003

Kristen Dams-O'Connor, Ph.D.
 617 Munro Ave
 Mamaroneck, NY 10543
 (212) 241-7587
 (212) 241-0137
 SS #: 070 66 2643

STATEMENT FOR LEGAL SERVICES RENDERED

To:
 Bruce A. Seidman
 Professional Liability Practice Group, Northern NJ
 425 Eagle Rock Ave, Suite 102
 Roseland, NJ 07068
 (973) 618-4173

Gregg Scharaga
 Havkins Rosenfeld Ritzert & Varriale, LLP
 1065 Avenue of the Americas - Suite 800
 New York, NY 10018
 V: 646-747-5113 | F: 212-564-0203
 Main: 212-488-1598

Date: March 18, 2014

Name of Client: Angel Siguencia

| DATE | SERVICE RENDERED | HOURS | RATE | TOTAL |
|-------------------|--|-------|----------|---------|
| December 16, 2013 | Review of medical records | 4 | 350/hr | \$ 1400 |
| December 19, 2013 | Phone call with attorneys | 0.75 | 88/15min | \$ 264 |
| January 30, 2014 | Neuropsychological testing | 4 | 350/hr | \$ 1400 |
| January 30, 2014 | Scoring and interpretation of test data | 2 | 350/hr | \$ 700 |
| February 20, 2014 | Neuropsychological testing | 3 | 350/hr | \$ 1050 |
| February 20, 2014 | Scoring and interpretation of test data | | | |
| | Compilation of written report | 4 | 350/hr | \$ 1400 |
| March 4, 2014 | Phone call with attorneys to review findings | 0.5 | 88/15min | \$ 176 |

TOTAL \$6390
 Less Retainer -\$1500*

(*Outstanding \$375 retainer payment was sent 3/18/14)

Total Amount Due Upon Receipt: \$4,890

Scanned

MITCHELL S. RAPS, M.D.
 NEUROLOGY
 110 EAST 82ND STREET
 NEW YORK, NEW YORK 10028
 TELEPHONE (212) 860-1800
 Tax ID# 13-3518344

April 15, 2014

Marshall Dennehey Warner Coleman & Goggin
 425 Eagle Rock Avenue, Suite 302
 Roseland, NJ 07068
 Attn: Mr. Bruce Seidman

Re: Angel Siguencia v. Gilbane Building Company
 Index#: 305543/11
 File#: 12180.03595-JAM

For Professional Services

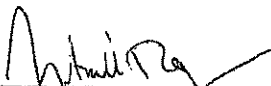
| | <u>Hrs/Rate</u> | <u>Amount</u> |
|--|--------------------|---------------|
| Examination of Patient (2.5 Hrs)(4/1/14), Telephone Discussion with Mr. Seidman (1.0 Hrs) (4/1/14), Review of Extensive Medical Records, and Preparation of Written Report (33 Hrs). | 36.50 400.00/hr | 14,600.00 |

Total Amount Due:

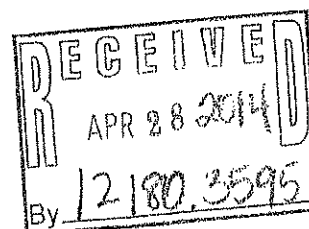
| | |
|-------|-------------|
| 36.50 | \$14,600.00 |
|-------|-------------|

Balance due

| |
|-------------|
| \$14,600.00 |
|-------------|


 Mitchell S. Raps, M.D.

As per our office policy the report will be forwarded upon receipt of payment in full.



0E248130153



onesource
document management

OneSource Document Management, Inc.
905 Marconi Avenue
Ronkonkoma, NY 11779
877-COPY-REC

Telephone: 877-267-9732

PAST DUE

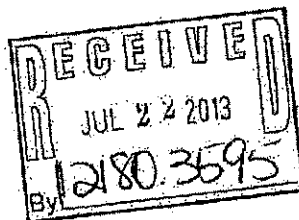
INVOICE

| | |
|--------------|------------|
| Invoice # | 375044 |
| Customer # | 130439 |
| Invoice Date | 05/02/13 |
| Phone # | 41-2108458 |

Bill to:
Marshall, Dennehey, Warner, Coleman
425 Eagle Rock Ave Suite 302
Roseland, NJ 07068

Ship to:
Marshall, Dennehey, Warner, Coleman
425 Eagle Rock Ave Suite 302
Roseland, NJ 07068

| Location | Referral # | Referral Type | Terms |
|---|--|---------------|------------------|
| St. Barnabas Hospital | 0 | Medical File | Due Upon Receipt |
| Medical Record # | Patient Name | Reference | |
| XFM2+858155A | Angel Siguencia | | |
| Quantity | Item Description | Unit Price | Extended Price |
| 234 | COPIED PAGES File Pages | 2.10 | 491.40 |
| 1 | PROCESSING FEE Processing Fee | 35.00 | 35.00 |
| 1 | XRAYs CD of X-Ray Films 5 xrays Defense Attorney 9677835 | 18.00 | 18.00 |
| <p>Your request will be finalized upon receipt of payment. Returned checks are subject to a \$30 fee. No refunds for cancellations on paid requests. All fees are subject to increase.</p> <p>The following charges apply to non-qualified parties only:</p> <ul style="list-style-type: none"> * Revisions to your original request will incur a \$50 charge. * Paid requests that cannot be completed due to lack of proper authorization are subject to a surcharge of the greater of \$50 or 30% of the subtotal of this invoice. | | | |



Please remit payment along with this invoice to:

OneSource Document Management, Inc.
Attn: Accounts Receivable
905 Marconi Avenue
Ronkonkoma, NY 11779
877-COPY-REC

| | |
|---------------|--------|
| Subtotal | 544.40 |
| Postage | 4.60 |
| Invoice Total | 549.00 |
| Payment | 0.00 |
| Balance Due | 549.00 |

41-2108458 8/27/13

DIRECT MAIL

0B012150046



NSI
25 Dorchester Ave, Box 51187
Boston, MA 02205
(800)721-7055
<http://www.nationalSI.com>

National Surveillance & Investigation Inc.

Invoice

| Date | Invoice No. |
|------------|-------------|
| 05/02/2014 | NY1287A-VC2 |
| Due Date | |
| 06/01/2014 | |

| |
|--|
| Bill To: Paul Kataya Liberty Mutual Insurance Co. 13 Riverside Dr. Weston, MA 02493 |
|--|

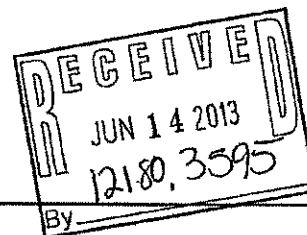
| Claimant | Case ID/Claim # |
|-----------------|-----------------|
| Angel Siguencia | 4 video copies |

| Activity | Quantity | Rate | Amount |
|---|----------|--------|-----------------|
| • 4 Video Copy's | 4 | 50.00 | 200.00 |
| • Administration fee to cover my time making the videos and gathering report, invoice's, all letters and emails relating to this case requested by Bruce Seidman Esq. | 1 | 125.00 | 125.00 |
| Total | | | \$325.00 |

Check out our Guaranteed Surveillance Program!

EIN: 20-2773003

Edward Crane MD, PC
 152 East 73rd St.,
 New York, NY 10021 - 4362
 (212) 472 - 1100
 TAX ID : 132867654
 STATEMENT



Account : 1001635
 BRUCE SEIDMAN
 MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN
 425 EAGLE ROCK AVENUE., #32 SELECT DISTINCT id.patient_id,
 id.ins_code FROM insinfo id WHERE id.insured_id = '%s' AND id.ins_code
 ROSELAND, NJ 07068

Bill Date : 05/29/2013

DOL: 7/7/2010
 FILE#: 12180.03595-JAM

Please detach and return the bottom portion with your payment.

| Invoice | Date of Svc | Procedure/CPT Code | Charge | Pmt/Adj | Balance |
|---------|-------------|--------------------|--------|---------|---------|
|---------|-------------|--------------------|--------|---------|---------|

for Acct No : 1001635 : ANGEL SIGUENCIA

0000517743: Performing Provider : CRANE, EDWARD, MD

| | | | | | |
|------------|---------------------------|----|----------|----|----------|
| 05/29/2013 | 90620/LEGAL EXAM | \$ | 750.00 | \$ | 750.00 |
| 05/29/2013 | 73510/HIP, 2 VWS | \$ | 175.00 | \$ | 175.00 |
| 05/29/2013 | 72170/PELVIS, AP V | \$ | 150.00 | \$ | 150.00 |
| 05/29/2013 | RR180/RECORD REVIEW, 3HRS | \$ | 1,200.00 | \$ | 1,200.00 |

Sub Total : \$ 2275.00

| Current | > 30 days | > 60 days | > 90 days | > 120 days | In Coll. | Total Due |
|------------|-----------|-----------|-----------|------------|----------|------------|
| \$2,275.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$2,275.00 |

Please Specify Account : 1001635 on your check

50%
 CCST
 5/1/13

Make Checks Payable To :
 Edward Crane MD, PC
 152 East 73rd St.,
 New York, NY 10021 - 4362

152 East 73rd Street,
 New York, NY 10021 - 4362
 Billing Questions, Please Call :
 (212) 472 - 1100

13-2867654

8/13/13



NSI
25 Dorchester Ave # 51187
Boston, MA 02205

(800)721-7055
<http://www.nationalsi.com>

National Surveillance & Investigation Inc.

Invoice

| Date | Invoice # |
|------------|-------------|
| 05/02/2014 | NY1287A-VC2 |
| Due Date | |
| 06/01/2014 | |

| Bill To |
|---|
| Paul Kataya Liberty Mutual Insurance Co. 13 Riverside Dr. Weston, MA 02493 |

| Claimant | Case ID/Claim # |
|-----------------|-----------------|
| Angel Siguencia | 4 video copies |

| Activity | Quantity | Rate | Amount |
|---|----------|--------|----------|
| • 4 Video Copy's | 4 | 50.00 | 200.00 |
| • Administration fee to cover my time making the videos and gathering report, invoice's, all letters and emails relating to this case requested by Bruce Seidman Esq. | 1 | 125.00 | 125.00 |
| Total | | | \$325.00 |

Check out our Guaranteed Surveillance Program!

EIN: 20-2773003

Status Evaluations, Inc.

349 Lincoln Avenue, Rockville Centre, NY 11570

Tel: (516) 599-8008

e-mail: statusevaluation@aol.com

Fax: (516) 593-4802

June 18, 2013

Marshall, Dennehey, Warner, Coleman & Goggin
425 Eagle Rock Avenue Suite 302
Roseland, NJ 07068
Attn: Bruce A. Seidman, Esq.

RE: **Angel Siguencia v. Gilbane Building Company, et al**
D/A: 7/7/10

FOR PROFESSIONAL SERVICES RENDERED: _____

May 20, 2013 – Psychological Consultation, administration, evaluation, and interpretation of numerous psychological profiles and indices, all testing and evaluations performed in Spanish, extensive records review, written report of findings and opinion. Total Amount Billed..... \$6,250.00

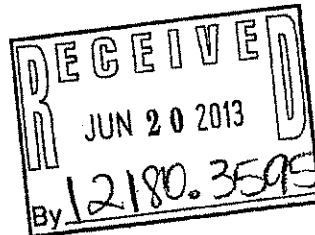
Marshall Dennehey Warner Coleman & Goggin's responsibility = 50% of total... \$3,125.00

Attached please find W9 Form with T.I.N. 11-3510495. Please make check payable to Status Evaluations, Inc.,

Thank you,

Susan Wall
IME Coordinator

Encl.



MITCHELL S. RAPS, M.D.
NEUROLOGY
110 EAST 82ND STREET
NEW YORK, NEW YORK 10028
TELEPHONE (212) 880-1900
Tax ID# 13-3518344


July 16, 2014

Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, NJ 07068
Attn: Mr. Bruce Seidman

Re: Angel Siguencia v. Gilbane Building Company
Index#: 305543/11
File#: 12180.03595-JAM

For Professional Services

| | <u>Hrs/Rate</u> | <u>Amount</u> |
|--|-------------------|-------------------|
| Medical Record Review 2.25 Hrs and Telephone Discussion (7/16/14) .67 Hrs. | 2.92 400.00/hr | 1,168.00 |
| Total Amount Due: | 2.92 | \$1,168.00 |
| Balance due | | <u>\$1,168.00</u> |



Mitchell S. Raps, M.D.

As per our office policy the report will be forwarded upon receipt of payment in full.

PAID
JUL 21 2014
12180.3595

Joseph B. Mills, P.E.
 710 Harlequin Lane
 Mullica Hill, NJ 08062

Invoice

| DATE | INVOICE # |
|-----------|------------|
| 8/27/2014 | 2014.029.1 |

| BILL TO | SHIP TO |
|--|---------|
| Bruce A. Seidman, Esquire Marshall, Dennehey, Warner, Coleman & Goggin 425 Eagle Rock Ave, Suite 302 Roseland, NJ 07068 | |

| DUE DATE | P.O. NUMBER |
|-----------|-------------|
| 9/27/2014 | 2014.029 |

| ITEM | DESCRIPTION | QTY | RATE | AMOUNT |
|---|--|-------------------|--------|----------|
| | 9-4-13 - Telecon with Bruce Seidman. | 0.7 | 250.00 | 175.00 |
| | 8-23-14 - Review Complaint, Discover Responses, Bills of Particulars, photographs, incident reports, project e-mails, meeting minutes, contracts, safety plans, Gilbane's projects file, drawings, specifications, and expert disclosures. | 13.5 | 250.00 | 3,375.00 |
| | 8-24-14 - Read deposition transcripts for Sequencia (333 pages). | 3.9 | 250.00 | 975.00 |
| | 8-25-14 - Read deposition transcripts for Pipher (375 pages). | 4.4 | 250.00 | 1,100.00 |
| | 8-26-14 - Read deposition transcript for Wuest (346 pages). | 4.1 | 250.00 | 1,025.00 |
| | 8-26-14 - Telecon with Bruce Seidman. | 0.7 | 250.00 | 175.00 |
| Siquencia v. Gilbane Building Company, et al. Docket No.: 305543/11 (Bronx County, NY) File No.: 12180.03595-JAM Fed Tax ID No.: 152-60-3546 | | Subtotal 6,825.00 | | |
| | | 0% TAX | | |
| | | Total 6,825.00 | | |



onesource 876
document management

0H261120076

PAST DUE

INVOICE

OneSource Document Management, Inc.
905 Marconi Avenue
Ronkonkoma, NY 11779
877-COPY-REC

Telephone: 877-267-9732

| | |
|---------------|------------|
| Invoice # | 318721-A |
| Consignment # | 98987 |
| Invoice Date | 06/25/12 |
| Ref ID # | 41-2108458 |

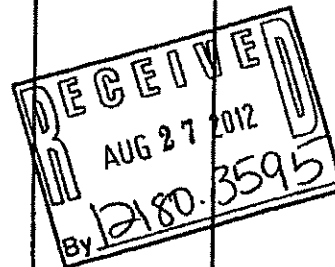
Bill To: Marshall, Dennehey, Warner, Coleman & Go

Marshall, Dennehey, Warner, Coleman & Go
425 Eagle Rock Ave. Suite 302
Roseland, NJ 07068

Ship To: Marshall, Dennehey, Warner, Coleman & Go

Marshall, Dennehey, Warner, Coleman & Go
425 Eagle Rock Ave. Suite 302
Roseland, NJ 07068

| Location | Request ID | Request Type | Terms |
|---|------------------|--------------|------------------|
| St. Barnabas Hospital | 7592870 | Medical File | Due Upon Receipt |
| Medical Record # | Patient Name | Reference | |
| FM858155A | Angel Siguencia | | |
| Quantity | Item Description | Unit Price | Extended Price |
| 234 | COPIED PAGES | 2.10 | 491.40 |
| | File Pages | | |
| 1 | PROCESSING FEE | 35.00 | 35.00 |
| | Processing Fee | | |
| If you are the Claimant's Attorney, please fax over a Letter of Representation for a revised invoice. Our fax number is 631.205.1211. Please reference the invoice number on your fax. | | | |
| <p>Your request will be finalized upon receipt of payment. Returned checks are subject to a \$30 fee. No refunds for cancellations on paid requests. All fees are subject to increase.</p> <p>The following charges apply to non-qualified parties only:</p> <ul style="list-style-type: none"> * Revisions to your original request will incur a \$50 charge. * Paid requests that cannot be completed due to lack of proper authorization are subject to a surcharge of the greater of \$50 or 30% of the subtotal of this invoice. | | | |



Please remit payment along with this invoice to:

OneSource Document Management, Inc.
Attn: Accounts Receivable
905 Marconi Avenue
Ronkonkoma, NY 11779
877-COPY-REC

| | |
|---------------|--------|
| Subtotal | 526.40 |
| Postage | 7.40 |
| Invoice Total | 533.80 |
| Payment | 0.00 |
| Balance Due | 533.80 |

Kristen Dams-O'Connor, Ph.D.
617 Munro Ave
Mamaroneck, NY 10543
(212) 241-7587
(212) 241-0137
SS #: 070 66 2643

STATEMENT FOR LEGAL SERVICES RENDERED

To:

Bruce A. Seidman, Esq.
Professional Liability Practice Group, Northern NJ
425 Eagle Rock Ave Suite 302
Roseland, NJ 07068
973-618-4173

Date: September 17, 2013

Name of Case: **Siguencia v. DASNY and Gilbane**

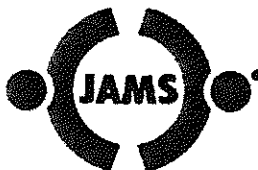
| DATE | SERVICE RENDERED | HOURS | RATE | TOTAL |
|--------------------|---|-------|----------|-------|
| September 17, 2013 | Retainer for IME, SPLIT BETWEEN 2 CLIENTS N/A (Fee for expert services: IME, records review, expert report). | | \$750 | \$750 |
| | | | TOTAL 40 | \$750 |

Total Amount Due Upon Receipt: \$750

C-17C-66-2643
9/24/13
CS

DIRECT MAIL

0B328140266

**INVOICE**Invoice Date

11/18/14

Invoice Number

0003313042-425

To: **Paul Kayata**
Liberty Mutual Insurance Co.
P.O. Box 7214
London, KY 40742

Reference #: **1425016774** MB
 Billing Specialist: **Erwin Gonzalez**
 Email: **egonzalez@jamsadr.com**
 Telephone: **(949) 224-4642**
 Employer ID: **68-0542699**

RE: **Siguencia, Angel vs. Gilbane Building Company, et al.**

Representing: **Gilbane Building Company ; Gilbane**
Inc. ; Gilbane Resources

Neutral(s): **Justice Allen Hurkin-Torres (Ret.)**Hearing Type: **Mediation**Rep# **7**

| Date/ Time | Description | Hours | Rate/Hr. | Total Billed | Parties Billed | Your Share |
|---------------|------------------------------------|-------|----------|------------------------------------|-------------------|---------------|
| 11/13/14 | Justice Allen Hurkin-Torres (Ret.) | 3.00 | 650.00 | 1,950.00 | 3 | 650.00 |
| 1:00:00PM | Session Time | | | | | |
| 11/13/14 | Justice Allen Hurkin-Torres (Ret.) | 1.00 | 650.00 | 650.00 | 3 | 216.66 |
| 1:00:00PM | Additional Session Time | | | | | |
| 11/18/14 | Case Management Fee | | | | | 275.00 |
| | | | | Fees | | 1,141.66 |
| | | | | Total | \$ | 1,141.66 |
| | | | | Outstanding Balance as of 11/18/14 | \$ | 216.66 |

Invoice total is based on the fee split agreed upon by all parties. If the case cancels or continues, fees are due per our cancellation and continuance policy. Please make checks payable to JAMS, Inc. Payment is due upon receipt.

Standard mail
P.O. Box 512850
Los Angeles, CA 90051

Overnight mail
1920 Main St. Suite 300
Irvine, CA 92614

DRTMASTERS.COM LLC
IMAGING CONSULTING SERVICES

11/15/2013

Havkins, Rosenfeld, Ritzert and Varriale

Marshall, Dennehey, Warner, Coleman and Goggin

RE: Siguencia

Please accept this invoice:

Record review and report preparation:

8/31/13: 1 hour

9/1/13: 45 minutes

Total: hours @ 850/hr= 1487.50

Thank you,

Lawrence Neil Tanenbaum MD FACR
Senior Member of the American Society of Neuroradiology
Director of MRI and CT

Mount Sinai Medical Center
50 Murray Street, Suite 1001
New York, NY 10007

Joseph B. Mills, P.E.
710 Harlequin Lane
Mullica Hill, NJ 08062

12180.3595

Invoice

| DATE | INVOICE # |
|------------|------------|
| 11/20/2014 | 2014.029.2 |

| BILL TO | SHIP TO |
|--|---------|
| Bruce A. Seidman, Esquire Marshall, Dennehey, Warner, Coleman & Goggin 425 Eagle Rock Ave, Suite 302 Roseland, NJ 07068 | |

| DUE DATE | P.O. NUMBER |
|------------|-------------|
| 12/20/2014 | 2014.029 |

| ITEM | DESCRIPTION | QTY | RATE | AMOUNT |
|---|--|-------------------|--------|----------|
| | 10-6-14 - Review DASNY Supplemental Response to Production of Documents. | 4 | 250.00 | 1,000.00 |
| Siquencia v. Gilbane Building Company, et al. Docket No.: 305543/11 (Bronx County, NY) File No.: 12180.03595-JAM Fed Tax ID No.: 152-60-3546 | | Subtotal 1,000.00 | | |
| | | 0% TAX | | |
| | | Total 1,000.00 | | |



NSI
PO Box 131
Winchendon, MA 01475
(800)721-7055
<http://www.nationalsi.com>

National Surveillance & Investigation Inc.

Invoice

| Date | Invoice No. |
|------------|-------------|
| 12/15/2013 | NY1287A |
| Due Date | |
| 01/01/2014 | |

| Bill To |
|---|
| Paul Kataya Liberty Mutual Insurance Co. 13 Riverside Dr. Weston, MA 02493 |

| Claimant | Case ID/Claim # |
|-----------------|-----------------|
| Angel Siguencia | P22010726 |

| Activity | Quantity | Rate | Amount |
|---|----------|--------|----------|
| • Flat Rate Guaranteed Surveillance - Dates: December 3, 2013 | 1 | 999.99 | 999.99 |
| Total | | | \$999.99 |

Check out our Guaranteed Surveillance Program!

EIN: 20-2773003